

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

BRYAN P. SPENCE, individually	§	
and as a representative of a class of	§	
similarly situated persons, and on	§	
behalf of the AMERICAN AIRLINES,	§	
INC. 401(K) PLAN and the	§	
AMERICAN AIRLINES, INC. 401(K)	§	
PLAN FOR PILOTS,	§	
	§	Case No. 4:23-cv-00552-O
Plaintiffs,	§	
	§	
v.	§	
	§	
AMERICAN AIRLINES, INC., and the	§	
AMERICAN AIRLINES EMPLOYEE	§	
BENEFITS COMMITTEE,	§	
	§	
Defendants.	§	

MOTION FOR CLASS CERTIFICATION

Plaintiff Bryan P. Spence (“Plaintiff”), on behalf of himself and all others similarly situated as participants in the American Airlines, Inc. 401(k) Plan and the American Airlines, Inc. 401(k) Plan for Pilots, the two participating plans of the Master Trust for DC Plans of American Airlines, Inc. and Affiliates, files this Motion for Class Certification and respectfully requests that the Court enter an order certifying the following class:

All participants and beneficiaries of the American Airlines, Inc. 401(k) Plan and/or the American Airlines, Inc. 401(k) Plan for Pilots from June 1, 2017 through the date of judgment (the “Class Period”), excluding Defendants and any of their directors, officers, or employees with responsibility for the Plan’s investment or administration (the “Class”).

Plaintiff further requests that the Court enter an order appointing Plaintiff's counsel as class counsel under Rule 23(g) of the Federal Rules of Civil Procedure.

Dated: November 21, 2023.

Respectfully submitted.

/s/ Andrew B. Stephens

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Attorneys for Plaintiff

**admitted pro hac vice*

CERTIFICATE OF CONFERENCE

I hereby certify that the parties conferred on November 21, 2023 regarding the foregoing Motion for Class Certification. Defendants oppose the Motion.

/s/ Andrew B. Stephens
Andrew B. Stephens

CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2023, I served the foregoing document on Defendants in accordance with the Federal Rules of Civil Procedure.

/s/ Andrew B. Stephens
Andrew B. Stephens